

August 4, 2022

Via Email

W. Mullins McLeod, Jr., Esq.
E: mullins@mcleod-lawgroup.com
H. Cooper Wilson, III, Esq.
E: cooper@mcleod-lawgroup.com
McLeod Law Group, LLC
3 Morris Street, Suite A
Charleston, SC 29403

Re: *Meswaet Abel, as Personal Representative over the Estate of Zerihun Wolde and as Natural Parent and Legal Guardian for Adam Wolde and Wubit Wolde v. Lack's Beach Service, City of Myrtle Beach and John Doe Lifeguard*
Case No. 2019-CP-26-07075
HBS File No.: 4673.0036

Dear Mullins:

Please accept this correspondence as Defendant Lack's Beach Service, Inc.'s offer to settle Plaintiff's claims as follows:

1. Arch Specialty Insurance Company will tender the full extent of the applicable liability insurance coverage limits - \$3 million.
2. As an integral part of the Order approving the settlement, Lack's Beach Service, Inc. will agree to, and by Court Order will be bound to, a strict prohibition against any lifeguard engaging in any commercial activity on any City of Myrtle Beach beach.
3. As an integral part of the Order approving the settlement, Lack's Beach Service, Inc will agree to, and by Court Order will be bound to, provide separate and distinct non-lifeguard personnel to conduct any commercial activity on any City of Myrtle Beach beach (to the extent that any commercial activity is permitted to be conducted by Lack's Beach Service, Inc.).
4. The settlement will include a full, final and complete release of all claims against Lack's Beach Service, Inc.

MOUNT PLEASANT, SC

HALL BOOTH SMITH, P.C.

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I look forward to hearing from you at your convenience. Thanks in advance for your kind consideration.

Very truly yours,

/s/Joseph D. "Trey" Thompson, III

Joseph D. Thompson, III

JDT,III/vrb

cc: J. Christopher Pracht, V, Esq. (via email: chris@864law.com)